

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN

In re:

Chapter 7

Megan Kurtz

Case No. 22-11903

Debtor.

Megan Marie Kurtz,

Plaintiff,

Adversary No. 23-00006-cjf

vs.

United States Department of Education,

Great Lakes Educational Loan Services, Inc.,

SoFi Lending Corporation,

and

Higher Education Loan Authority of the State of Missouri
a/k/a Mohela,

Defendants.

**MOTION TO DISMISS DEFENDANTS GREAT LAKES EDUCATIONAL LOAN
SERVICES, INC. AND HIGHER EDUCATION LOAN AUTHORITY OF THE STATE
OF MISSOURI A/K/A MOHELA**

Plaintiff, Megan Marie Kurtz (hereinafter “Plaintiff” and/or “Kurtz”), by her attorneys,
Fuhrman & Dodge, S.C., by Attorney Jennifer M. Schank, moves to this court to dismiss Great
Lakes Educational Loan Services, Inc. (“Great Lakes”) and Higher Education Loan Authority of

the State of Missouri a/k/a Mohela ("Mohela") as parties to this Adversary Proceeding, and in support states:

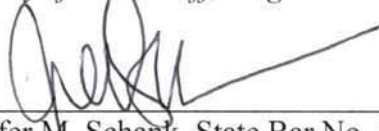
1. Plaintiff filed this Adversary Proceeding on February 26, 2023.
2. Plaintiff named Great Lakes and Mohela as parties to this Adversary Proceeding.
3. Great Lakes and Mohela have since provided information to Plaintiff showing that they are student loan servicers and were never owners of Plaintiff's student loans.
4. Plaintiff does not intend to continue to prosecute its claims in this Adversary Proceeding against Great Lakes and Mohela.
5. Judicial economy is served by not requiring the Plaintiff to file an amended complaint and reset pretrial deadlines.
6. Plaintiff voluntarily dismisses its claims against Great Lakes and Mohela in this Adversary Proceeding.

WHEREFORE Plaintiff, Megan Kurtz, respectfully requests an order directing the dismissal of Great Lakes and Mohela as parties in this action with prejudice.

Dated this 9th day of May, 2023.

FUHRMAN & DODGE, S.C.

Attorneys for Plaintiff, Megan Marie Kurtz



Jennifer M. Schank, State Bar No. 1077110
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Middleton, WI 53562
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Fax: 608-841-1502
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SoFi Lending Corporation,

and

Higher Education Loan Authority of the State of Missouri
a/k/a Mohela,

Defendants.

**NOTICE OF MOTION TO DISMISS DEFENDANTS GREAT LAKES EDUCATIONAL
LOAN SERVICES, INC. AND HIGHER EDUCATION LOAN AUTHORITY OF THE
STATE OF MISSOURI A/K/A MOHELA**

PLEASE TAKE NOTICE that the above-named Plaintiff, Megan Kurtz, by her attorneys, Fuhrman & Dodge, S.C., have filed a Motion to Dismiss its claims against parties Great Lakes Educational Loan Services, Inc. and Higher Education Loan Authority of the State of Missouri a/k/a Mohela, a copy of which is attached hereto and incorporated herein.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to enter an order granting Plaintiff's motion, then on or before **twenty-one (21) days** from the date of this Notice, you or your attorney must:

File with the court a written objection and request for hearing, explaining your objection to Plaintiff's Motion to Dismiss at:

United States Bankruptcy Court
120 North Henry Street
Madison, WI 53703

If you mail your objection to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:


Attorney Jennifer M. Schank
Fuhrman & Dodge, S.C.
6405 Century Ave., Suite 101
Middleton, WI 53562

U.S. Trustee
780 Regent Street, Suite 304A
Madison, WI 53715

If you or your attorney does not take these steps, the court may decide that you do not oppose the Debtor's Motion to dismiss parties Great Lakes Educational Loan Services, Inc. and Higher Education Loan Authority of the State of Missouri a/k/a Mohela, and, therefore, may enter an order granting said Motion.

Dated this 9 day of May, 2023.

FUHRMAN & DODGE, S.C.
Attorneys for Plaintiff, Megan Kurtz

By: 
Jennifer M. Schank

ADDRESS:
6405 Century Avenue, Suite 101
Middleton, WI 53562
Phone: (608) 327-4200
jschank@fuhrmandodge.com

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN**

In re:

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Debtor.

Megan Kurtz,

Plaintiff,

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vs.

United States Department of Education,

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SoFi Lending Corporation,

and

Higher Education Loan Authority of the State of Missouri
a/k/a Mohela,

Defendants.

AFFIDAVIT OF MAILING

STATE OF WISCONSIN)

) ss.

COUNTY OF DANE)

The undersigned, being first duly sworn on oath, deposes and says that on the 9th day of May, 2023, the undersigned served a copy of the Notice of Motion to Dismiss Defendants Great Lakes Educational Loan Services, Inc. and Higher Education Loan Authority of the State of Missouri a/k/a Mohela and Motion to Dismiss Defendants Great Lakes Educational Loan Services, Inc. and Higher Education Loan Authority of the State of Missouri a/k/a Mohela on the following parties listed below via ECF:

U.S. Department of Education
c/o Attorney Theresa M. Anzivino
Assistant United States Attorney
Western District of Wisconsin
222 West Washington Avenue, Suite 700
Madison, Wisconsin 53703

SoFi Lending Corporation
c/o Attorney Maxim Marling
Zwicker & Associates, P.C.
11414 West Park Place, Suite 106
Milwaukee, WI 53224

The undersigned, being first duly sworn on oath, deposes and says that on the 9th day of May, 2023, the undersigned mailed, properly enclosed in a postpaid envelope, a copy of the Notice of Motion to Dismiss Defendants Great Lakes Educational Loan Services, Inc. and Higher Education Loan Authority of the State of Missouri a/k/a Mohela and Motion to Dismiss Defendants Great Lakes Educational Loan Services, Inc. and Higher Education Loan Authority of the State of Missouri a/k/a Mohela to the following parties:

Office of the U.S. Trustee
780 Regent Street, #304A
Madison, WI 53715

U.S. Department of Education
c/o Attorney Theresa M. Anzivino
Assistant United States Attorney
Western District of Wisconsin
222 West Washington Avenue, Suite 700
Madison, Wisconsin 53703

U.S. Department of Education
Attn: Miguel Cardona, Sect. of
Education
400 Maryland Avenue, SW
Washington, D.C. 20202

SoFi Lending Corporation
375 Healdsburg Avenue, Ste. 280
Healdsburg, CA 95448-4151

SoFi Lending Corporation
c/o Attorney Maxim Marling
Zwicker & Associates, P.C.
11414 West Park Place, Suite 106
Milwaukee, WI 53224

Great Lakes Educational Loan Services, Inc.
2401 International Lane
Madison, WI 53704

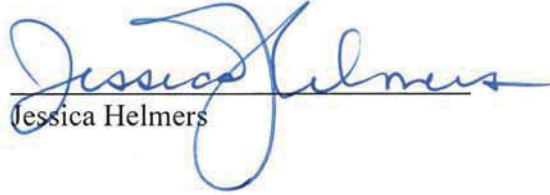
Higher Education Loan Authority of the State of Missouri a/k/a Mohela
633 Spirit Drive
Chesterfield, MO 63005-1243

Higher Education Loan Authority of the State of Missouri a/k/a Mohela
c/o Attorney Scott Lause
633 Spirit Drive
Chesterfield, MO 63005-1243

Subscribed and sworn to before me
This 9th day of May, 2023



J. A. Pearsall Geiger
Notary Public, State of Wisconsin
My Commission expires: 7/14/25



Jessica Helmers

J.A. Pearsall Geiger
Notary Public
State of Wisconsin